## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

Joel Vangheluwe and Jerome Vangheluwe,

Plaintiffs,

v.

GotNews, LLC, Freedom Daily, LLC, Charles C. Johnson, Alberto Waisman, Jeffrey Rainforth, Jim Hoft, David Petersen, Jonathan Spiel, Shirley Husar, Eduardo Doitteau, Lita Coulthart-Villanueva, Kenneth Strawn, Patrick Lehnhoff, Beth Eyestone, Lori Twohy, Raechel Hitchye, James Christopher Hastey, Christopher Jones, Connie Comeaux, Gavin McInnes, Richard Weikart, and Paul Nehlen,

Defendants.

Case No.: 2:18-cv-10542-LJM-EAS

Hon. Laurie J. Michelson

Mag. Elizabeth A. Stafford

# REQUEST TO ISSUE JUDGMENT IN A CIVIL ACTION

COMES NOW Plaintiff Jerome Vangheluwe and respectfully request the Court direct the Clerk of the United States District Court for the Eastern District Michigan, Southern Division to enter the attached <u>Judgment in a Civil Action</u>. The attached represents a true and accurate judgment pursuant to the agreement of the offer of settlement. [Doc. 34].

This judgment<sup>1</sup> was sent to counsel for GotNews, LLC on July 6, 2018. Counsel represented on July 9, 2018 that he was "generally fine except the line about post-judgment interest is inaccurate as to calculation. There is better language we will provide."

The judgment was sent to counsel for GotNews, LLC again on August 24, 2018, asking for comments by August 30, 2018. To date, Plaintiff has not received proposed revisions.

Post judgment interest is "calculated form the date of the entry of the judgment, at a rate equal to the weekly average 1-year constant maturity Treasury yield, as published by the Board of Governs of the Federal Reserve System, for the calendar week preceding the date of judgment." 28 U.S.C. § 1961(a). Post judgment interest compounds annually. 28 U.S.C. § 1961(b). The attached represents an accurate post-judgment interest rate should the court enter final judgment on the date of filing.

<sup>&</sup>lt;sup>1</sup> The judgments sent to Counsel in July contained a different post-judgment interest rate, as that number changes weekly.

Respectfully submitted,

SOMMERMAN, McCAFFITY & QUESADA, L.L.P.

## \_/s/\_Andrew B. Sommerman\_

Andrew B. Sommerman
ATTORNEYS FOR PLAINTIFFS
Texas State Bar No. 18842150
3811 Turtle Creek Boulevard,
Suite 1400
Dallas, Texas 75219
214/720-0720 (Telephone)
214/720-0184 (Facsimile)
andrew@textrial.com

#### **AND**

KIRK, HUTH, LANGE & BADALAMENTI, PLC

Raechel M. Badalamenti (P64361) CO-COUNSEL FOR PLAINTIFFS 19500 Hall Road, Suite 100 Clinton Township, MI 48038 (586) 412-4900 Fax: (586) 412-4949 rbadalamenti@khlblaw.com

Dated: August 31, 2018

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on August 31, 2018, the foregoing Request was served via ECF on counsel of record for defendants who have appeared in this case, as well as to the following ProSe Defendants via First Class Mail:

Lita Coulthart-Villanueva
Jeffries St.
Anderson, CA

Kenneth G. Strawn
Cypress Lane
Mission Viejo, CA

Jeffrey Rainforth
H St., Apt.
Sacramento, CA

/s/\_Andrew B. Sommerman\_